

Mayor Steve Van Oort and Council Members:

My name is Carol Miller, I along with my husband Randy we own a farm which is also our home site for our farming operation located at 12023 NE 22<sup>nd</sup> Street, Ankeny, IA. 50021. Our farm is located north of Otter Creek Golf Course and lies between Interstate 35 and NE 22<sup>nd</sup> Street. We are in the North Polk School District, not in the area of intended growth and Agriculture designated in the Polk County Comprehensive Plan.

The reason I come before you tonight is to oppose the designation placed upon our farm as depicted in the Ankeny Comprehensive Plan as a "Bluebelt" as shown on Page 82 & 83. Page 98 describes Bluebelts/Greenways as: Including environmentally sensitive areas, including high slopes, creek basins, flood plains, wetlands, wooded areas that will remain generally underdeveloped. These areas should remain undeveloped or in a passive recreational use... As you look at these maps and the description there is no indication how much land is involved. Our farm is 118 acres and it appears that a greater portion of the farm would be lost to a "bluebelt" designation. In all due respect our land does not fit this description. We have no environmental sensitive areas the entire tillable acres are farmed each year. The only non-tillable acres are where our home, buildings and storage bins are located. We have no high slopes which the comp plan describes as greater than 14%, the highest slope we have on the farm is in the range of 4-5%. We have no creek basin, no flood plain or wet land designation and the only area where there are trees are on our homesite and planted in the Interstate ROW. Our farm is tiled, and during a normal year of snow melt and rainfall we do not have problems with crop loss. On average it takes 20" of moisture to produce a corn or soybean crop during a normal growing season October to October. The hotter the temperature the more moisture is needed. The last several years 2008, 2009 and 2010 have been above normal precipitation and have caused some problems. Published June 22, "This is the 13<sup>th</sup> wettest June in 138 years of Iowa weather records per Harry Hillaker with 10 days to go". Our neighbor's and our tile system may have been compromised by a possible blockage and DOT is checking into the problem next to the Interstate. During the construction of Otter Creek Golf Course the developer connected our tile lines into the 24" tile system to the golf course irrigation ponds. We have not received the requested elevations map for review, and in theory, there should be no problem with drainage.

Our concern also is once designated as a 'bluebelt' that future situations may arise and as stated on page 72 'Create new ordinances as necessary'. "To codify the guidelines within this chapter it may be necessary to create ordinances that govern stream buffers and sensitive areas". This is a concern as we are not within the city limits and how it will affect our farming operation and valuation of our land when these situations do not exist. We are concerned about a 'blanket or across the board ordinances being created and that we would be in a continued discussion as to whether or not this would apply to our farm. The designation of a 'bluebelt' on our land is not justified. Other bluebelt areas north of the City limits were removed as being outside the city limits and in another school district. When and if we want to be annexed into Ankeny we understand that each parcel is considered on its own merits and plans are drawn accordingly for development based on current criteria and best management practices.

In conclusion, I respectfully request that any depiction of a bluebelt/greenbelt designation of our farm be removed from the various maps as currently shown 'examples' pages 82, 83, 104, 132, 140 & 231. Also shown under parks/trails examples pages 113, 122, 128, 130, 134, 136, 138, & 140. On page 60 a potential 'management area' and page 62 streams D & E should be removed. I have helped farmed this land for 32 years: spring and fall tillage work, planting, walked beans and combined crops. I have seen it at it's best and worst. As previously mentioned there are no open creeks, swales or streams nor do we have waterways or wetlands, high slopes or wooded areas on our farm. In Closing, I thought this had been worked out with the P&Z Commission. In part, some maps were corrected and the content of the soil

composition and historic data contains information on various soils in the Ankeny area. P&Z Commissioners voted on the Comp Plan without a final copy being finalized or available for public comment. I am providing a copy of the documents I presented to P&Z. We request that we remain as Agriculture designation under the Polk County Comprehensive Plan.

Thank you for giving me this opportunity to speak.

Carol Miller  
12023 NE 22<sup>nd</sup> Street  
Ankeny, IA 50021  
515-240-6870 [c]

*July 19, 2010*  
*Carol J Miller*

April 17, 2010

Jon Hanson  
Development Engineering Administrator  
Planning & Building  
City of Ankeny  
220 W. 1<sup>st</sup> Street  
Ankeny, IA 50023-1751

Dear Jon,

I am writing in response to our previous conversation regarding the City of Ankeny's proposed revision of the 2003 Comp Plan showing that our family farm located at 12023 NE 22<sup>nd</sup> Street, Ankeny, IA and adjacent to the Otter Creek Golf Course shows a 'Blue Belt' designation.

We are not in agreement with Bluebelt designation. Our farm is designated as 'Agriculture' on the Polk County Comprehensive Plan. Our family farm is in the undeveloped area of the County located in Elkhart Township. The bluebelt designation we feel is unjust, will cause a devaluation of the land and will not be desirable to a builder/developer as they review your comp plan based on the increased hurdles of compliance with the definition of 'Bluebelt' as it is stated in the plan on page 30: includes environmentally sensitive areas, including high slopes, creek basins, floodplains, wetlands, wooded areas that will remain generally undeveloped." The statement that "These areas should remain undeveloped or in passive recreation use.

Our farm land does not 'fit' this description. Our land is highly productive farm, tiled and well maintained without the areas included within your definition. Furthermore, the designation on the map and area drawn in does not define the area in size nor if the 'white area' in the center could be considered for future development. This area appears to take in a large portion of the farm. Our farm does not have a 'wetland' designation nor do we have high slopes which some may discern as highly erodible. There also appears to be a stream designation on your map which is not visible on many of the soil conservation aerial maps that I am attaching. We have long owned and farmed this land since 1978 and we have not experienced an open waterway that continues to flow through the farm.

As we are aware, 2008 was an extremely wet year. There are ponds visible on the aerial map, however, the contractor for the Otter Creek Golf Course tapped into our field tiles to fill the ponds/irrigation ponds for the golf course. My husband contacted the general manager to talk to him and took a copy of our tile map because it appeared they were searching for the tile. We were not contacted by the construction company nor did we receive elevation maps that we requested so that we could investigate what impact there would be to the drainage of our farm. We were requested by Paul Miller at NRCS to bring elevation maps in so that he could assess the situation. We have also made an inquiry about these elevation maps to you and it is our understanding that you are working with Tom Verrips to obtain further information regarding the tile connections.

It is with interest that our neighbor across the Interstate is also having drainage problems with a tile that runs in the ditch between our farm and the Interstate which John Hall contends was damaged during the construction of the golf course. He has been in contact with the State DOT office. If this has been damaged this would also effect the drainage of our farm. It is also possible that this may be one of the tile lines that feed the irrigation pond. The question then comes to mind as to who or what method of control for over flow outlet or restriction of water may be a cause of the farms failing to drain.

It is imperative that we have additional time to acquire additional supporting information and to have the time to be able to work with Paul Miller at the Ankeny NRCS office. Paul has currently been temporarily reassigned to another location. It is my understanding that he will return May 1, 2010 to the Ankeny office. Your comment sheet was not specific in a deadline to respond. I did inquire and was told as soon as possible or by Friday April 16, 2010. Given that you have chosen to present this information March 29 just prior to planting time, we are requesting that we also be given ample time to work through all that is necessary to further discuss this proposed designation. Or alternatively, you could leave our farm property classified as Agriculture. Your proposed update is through the time period to 2035, and many changes will be brought forward in the future, and you have already stated that your plan is to develop the land that has already been annexed to the west; so it appears that there is 'no rush' to change the designation at this point in time on our farm.

Given the above, our concerns are great:

1. How will this designation affect our ability to continue to farm with an agriculture classification and not be subject to penalty or 'wetland' classification?
2. How much land does the 'bluebelt' encompass?
3. How was this classification determined?
4. Did the individual or committee give consideration that the soils on our farm are similar to soils on adjoining land where houses and development has taken place?
5. The elevation of the land on our farm may not contribute to a substantial problem given that in most years, unless there is an extreme weather event or plugged field tile that the land is farmable. See attached aerial photos.
6. With the construction of berms on the northern edge of the Otter Creek Golf Course we would also like to inquire what consideration was given to drainage from our farm?
7. New techniques are being developed e.g. precast pavement for sidewalks, driveways and parking lots. In time there may be more environmental friendly construction materials and if field tile is left in place to function that the land will be suitable for many purposes.
8. It is apparent in the LiDAR Hillshade map that a proposed street is in place on the northern edge of the Otter Creek Golf Course – which would suggest that consideration was given and passed by the P&Z and that development would continue to the north into our farm at some point in time. Would the 'Bluebelt' designation create more hurdles, impact our land value and land use, annexation, zoning plans and changes?
9. Has our field tile drainage system that runs through the adjoining farm n/k/a Otter Creek Golf Course been compromised? Has the flow of water been restricted? Please provide elevations and construction maps of where our farm tile was connected to tile that drains to the ponds/ irrigation ponds, where the outlets are located and who has inspected the tile to determine if it is working properly. When were the inspections conducted?
10. Are you aware of the problems that John Hall contacted the State DOT regarding drainage? If so, what have you done to correct the problem?
11. Would this be considered a 'taking' by changing the designation and restricting the use of our land? We believe it would be.

It would also be greatly appreciated that written notice be provided and not just 'check the web site for future dates'. Our time and land is valuable to us just as your time is to you. Being able to sit down and have an open discussion is beneficial to all.

Our concerns are short term and long term in duration. It is important to us that further discussions be held, and that there is no rush to change the designation. This is not just a piece of land, it is our family farm from which we earn a living, having the tile system working properly is paramount for income and also considered as part of our retirement plan. If we decide in the future to consider other uses for our farm, it would then be appropriate to give further consideration to land use and smart growth.



I have also noted on page 35 of the Comp Plan "Implementation Recommendations that the last item mentioned: "Study individual Bluebelt corridors to develop a more detailed concept plan for each. When development is set to expand into a new part of a Bluebelt watershed, that corridor should be studied in more detail to better define the size and location of management facilities, the types of practices to be constructed and the amount of land that will need to be reserved to follow the performance guidelines for the corridor as outlined in this chapter."

*Given this statement and the definition given on page 30: "These areas should remain undeveloped or in passive recreation use " would it not be better that this definition on page 30 be 'softened' or further defined as stated above so that a 'hard line' is not drawn nor an individual developer or contractor at first glance be deterred from giving further consideration to future land use? The approach to how this definition of bluebelt is stated is harsh and too restrictive which may ultimately cause a decline in land value and prospective land use.*

Having information regarding 'Bluebelt' use and explain the plan's relationship to areas outside the city limit boundaries and considerations regarding annexation, zoning requirements and how the plan interfaces with these requirements would be helpful not only to the citizens but also to builders and developers. This would also allow the understanding of potential impacts and options that may or may not be available. The reason I raise this suggestion is this appears to be a new term that has been recently adopted by the P&Z and not readily recognized by many individuals.

In the interim, it is important that we be allowed to have additional time as mentioned above not only for ourselves to gather more information and talk with other experts but also for the City so that we may be able to resolve the multiple issues listed above.

In closing, we believe it is an arbitrary decision to classify portions of our property as a bluebelt. We feel that not enough consideration has been given to the soil classification and current and future land use. Designating our property as a bluebelt will limit development and severely decrease the value of our property. Reclassification of our land is a taking without just compensation, which is prohibited by the Constitution. Also, we would appreciate a greater dialogue before portions of our property are designated as a bluebelt. To reclassify property without consulting the landowner is a poor approach.

Respectfully submitted

Randy and Carol Miller  
12023 NE 22<sup>nd</sup> Street  
Ankeny, IA 50021  
515-240-1499 [Randy's cell]  
515-240-6870 [Carol's cell]

Enc: USDA – NRCS District Soil & Water conservation district maps – sent by US Postal mail

1. 2002 2/LiDAR soil map
2. LiDAR Hillshade map
3. Aerial Photo – 2009
4. Aerial Photo – 2008
5. Aerial Photo – 2007
6. Aerial Photo – 2006
7. Aerial Photo – 2005 – note our farm had better drainage than others in photo

8. Aerial Photo – 2002
9. Soils Map 2002 Aerial Photo – overlay
10. Aerial Photo – 1938 – note prior to Interstate construction

COMP PLAN INFORMATION PAGES:

1. Chapter 4 Stream Classification page 21
2. Stream Classification map
3. Chapter 5, Growth Area Bluebelts page 8; Figure 5-1
4. Definition of bluebelt as shown on page 30
5. Existing parks and trails with growth area bluebelts figure 6-4 page 18; Figure 6-4
6. Identified wetlands – National Wetland Inventory
7. Bluebelt – stream corridor and potential management areas
8. Quality Open Spaces with FEMA 100 yr flood and 500 yr flood
9. Implementation Recommendations page 35

c.c.

Mayor Steven D. Van Oort, City of Ankeny

John Peterson, Director of Planning and Building, City of Ankeny

Paul Miller, USDA

Jennifer Welch, CRESC Urban Conservationist

Polk County Supervisor Tom Hockensmith

Polk County Supervisor E. J. Giovannetti

E. Jensen, City of Ankeny



# Aerial Photo

Date: 4/8/2010

Customer(s): RANDY R MILLER

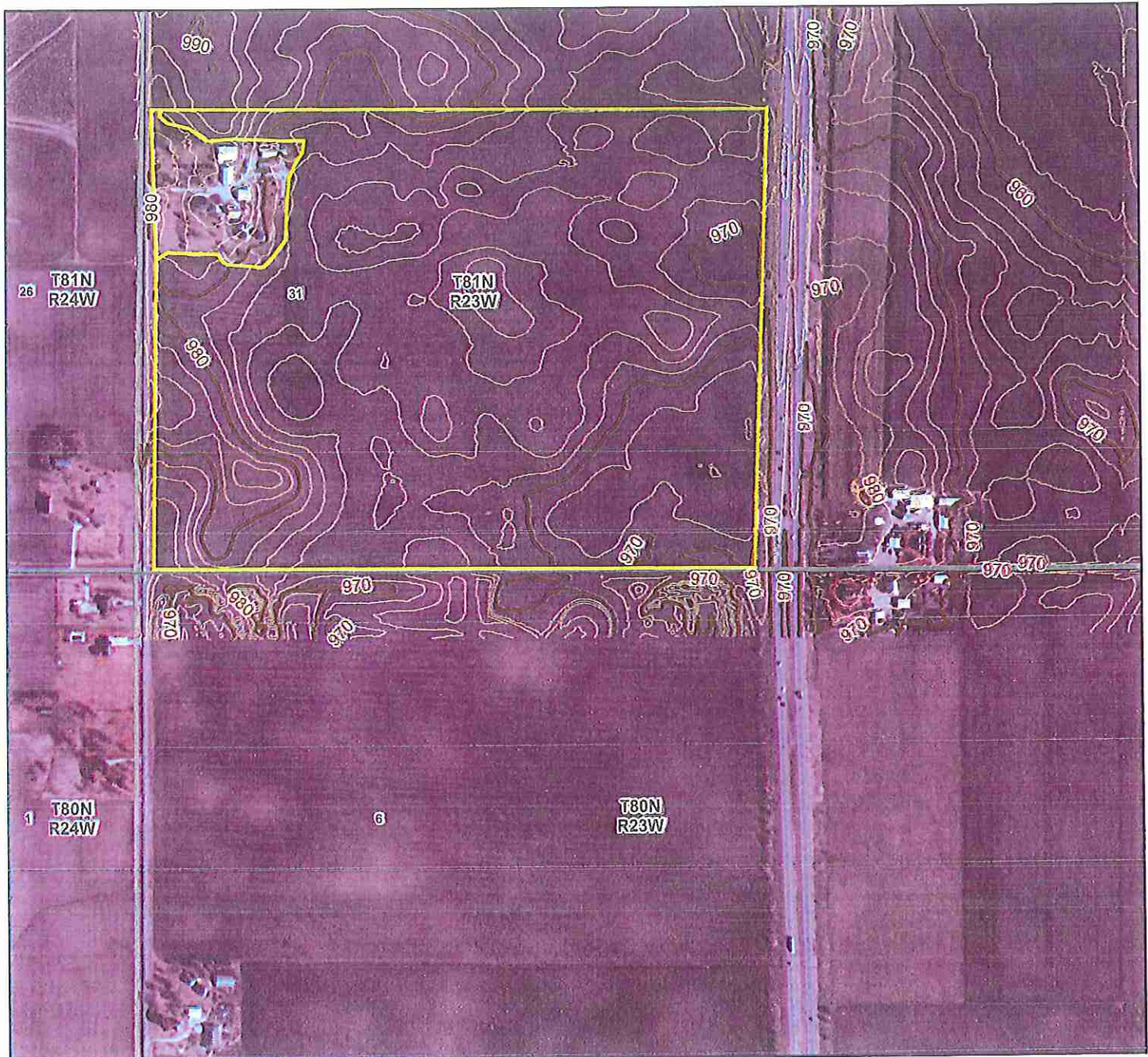
District: POLK SOIL & WATER CONSERVATION DISTRICT

Field Office: ANKENY SERVICE CENTER

Agency: USDA - NRCS

Assisted By: Nicky Williams

Legal Description: Sec 31 Elkhart Twp



## Legend

- Consplan-t825
- Polk Co - Section Lines
- Polk Co - Townships

contour\_t81n\_r23w

Contour interval

- 10ft
- 2ft

2002 - w/ LiDAR





# LIDAR Hillshade

Date: 4/8/2010

Customer(s): RANDY R MILLER

District: POLK SOIL & WATER CONSERVATION DISTRICT

Field Office: ANKENY SERVICE CENTER

Agency: USDA - NRCS

Assisted By: Nicky Williams

Legal Description: Sec 31 Elkhart Twp



## Legend



Consplan-t825

Polk Co - Section Lines

Polk Co - Townships

330 0 330 660 990 1,320 Feet





# Aerial Photo - 2009

Date: 4/8/2010

Customer(s): RANDY R MILLER

District: POLK SOIL & WATER CONSERVATION DISTRICT

Field Office: ANKENY SERVICE CENTER

Agency: USDA - NRCS

Assisted By: Nicky Williams

Legal Description: Sec 31 Elkhart Twp



## Legend

Consplan-t825

Polk Co - Section Lines

Polk Co - Townships

ortho\_1-1\_1n\_s\_ia153\_2009\_1.sid

## RGB

Red: Band\_1

Green: Band\_2

Blue: Band\_3



330 0 330 660 990 1,320 Feet





# Aerial Photo - 2008

Date: 4/8/2010

Customer(s): RANDY R MILLER

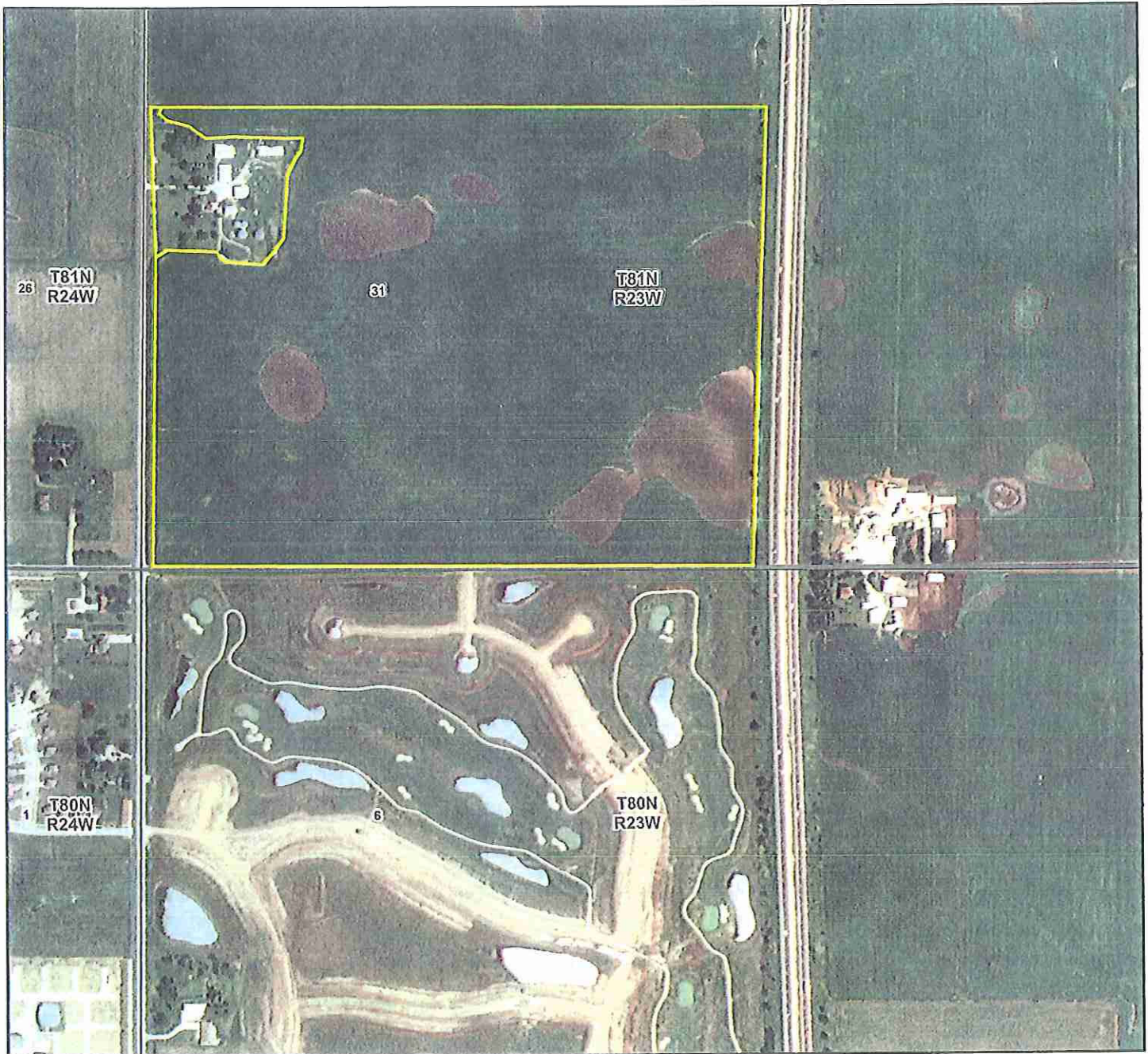
District: POLK SOIL & WATER CONSERVATION DISTRICT

Field Office: ANKENY SERVICE CENTER

Agency: USDA - NRCS


Assisted By: Nicky Williams


Legal Description: Sec 31 Elkhart Twp



## Legend

 Consplan-t825

 Polk Co - Section Lines

 Polk Co - Townships



330 0 330 660 990 1,320 Feet





# Aerial Photo - 2007

Date: 4/8/2010

Customer(s): RANDY R MILLER

District: POLK SOIL & WATER CONSERVATION DISTRICT

Field Office: ANKENY SERVICE CENTER

Agency: USDA - NRCS


Assisted By: Nicky Williams


Legal Description: Sec 31 Elkhart Twp



## Legend

 Consplan-t825

 Polk Co - Section Lines

 Polk Co - Townships



330 0 330 660 990 1,320 Feet





Customer(s): RANDY R MILLER

District: POLK SOIL & WATER CONSERVATION DISTRICT

Field Office: ANKENY SERVICE CENTER

Agency: USDA - NRCS


Assisted By: Nicky Williams


Legal Description: Sec 31 Elkhart Twp



Legend

 Consplan-t825

 Polk Co - Section Lines

 Polk Co - Townships



330 0 330 660 990 1,320 Feet





# Aerial Photo - 2005

Date: 4/8/2010

Customer(s): RANDY R MILLER

District: POLK SOIL & WATER CONSERVATION DISTRICT

Field Office: ANKENY SERVICE CENTER

Agency: USDA - NRCS

Assisted By: Nicky Williams

Legal Description: Sec 31 Elkhart Twp



## Legend



Consplan-t825

Polk Co - Section Lines

Polk Co - Townships

330 0 330 660 990 1,320 Feet





# Aerial Photo

Date: 4/8/2010

Customer(s): RANDY R MILLER

District: POLK SOIL & WATER CONSERVATION DISTRICT

Field Office: ANKENY SERVICE CENTER

Agency: USDA - NRCS

Assisted By: Nicky Williams

Legal Description: Sec 31 Elkhart Twp



## Legend

2002



Consplan-t825



Polk Co - Section Lines



Polk Co - Townships



330 0 330 660 990 1,320 Feet





# Soils Map - 2002 Aerial Photo

Date: 4/8/2010

Customer(s): RANDY R MILLER

District: POLK SOIL & WATER CONSERVATION DISTRICT

Field Office: ANKENY SERVICE CENTER

Agency: USDA - NRCS

Assisted By: Nicky Williams

Legal Description: Sec 31 Elkhart Twp



## Legend

Consplan-t825

Polk Co - Section Lines

Polk Co - Townships

Polk Co - SSURGO Soils



330 0 330 660 990 1,320 Feet





# 1938 Aerial Photo

Date: 4/8/2010

Customer(s): RANDY R MILLER

District: POLK SOIL & WATER CONSERVATION DISTRICT

Field Office: ANKENY SERVICE CENTER

Agency: USDA - NRCS


Assisted By: Nicky Williams


Legal Description: Sec 31 Elkhart Twp



## Legend

 Consplan-t825

 Polk Co - Section Lines

 Polk Co - Townships



330 0 330 660 990 1,320 Feet



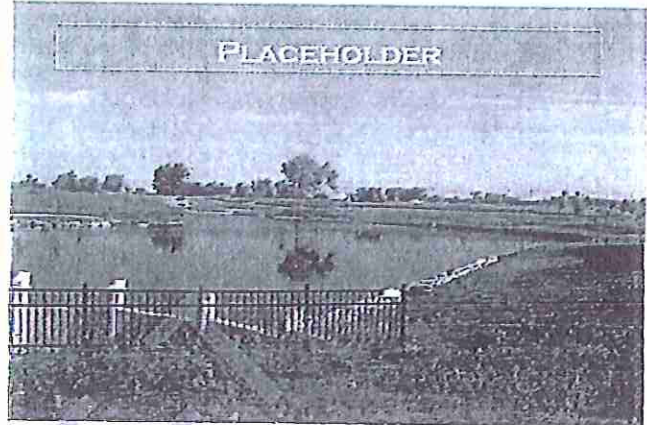


## STREAM CLASSIFICATION

While each stream is unique in size and character, the corridors within the City of Ankeny and the surrounding planning area can generally be grouped into four categories to determine the level of preservation or enhancement that is desirable:

**Major Defined Streams (Category A):** Four Mile, Saylor, Rock and Muchikinoc Creeks

These streams have established flood plains, baseflows and watershed areas of several square miles. Proper buffer protection and management and shoreline protection are key concerns for these streams. Ongoing maintenance may be required to control invasive species and to prevent larger erosion issues from being created. Such issues are difficult to be handled by either a private homeowner or an association of local property owners.



**Minor Defined Streams (Category B):** Deer, Otter, North Creeks; smaller unnamed urban streams

These streams have smaller watersheds than the Major Defined Streams and may or may not have established flood plains. They usually have normal baseflows and have defined stream banks, some of which may be steep and eroded. As with Category A Streams, proper buffer protection and management and shoreline protection are key concerns for these streams, as well as provisions for ongoing maintenance. Ongoing maintenance requirements may still exceed what homeowners or private associations can provide.



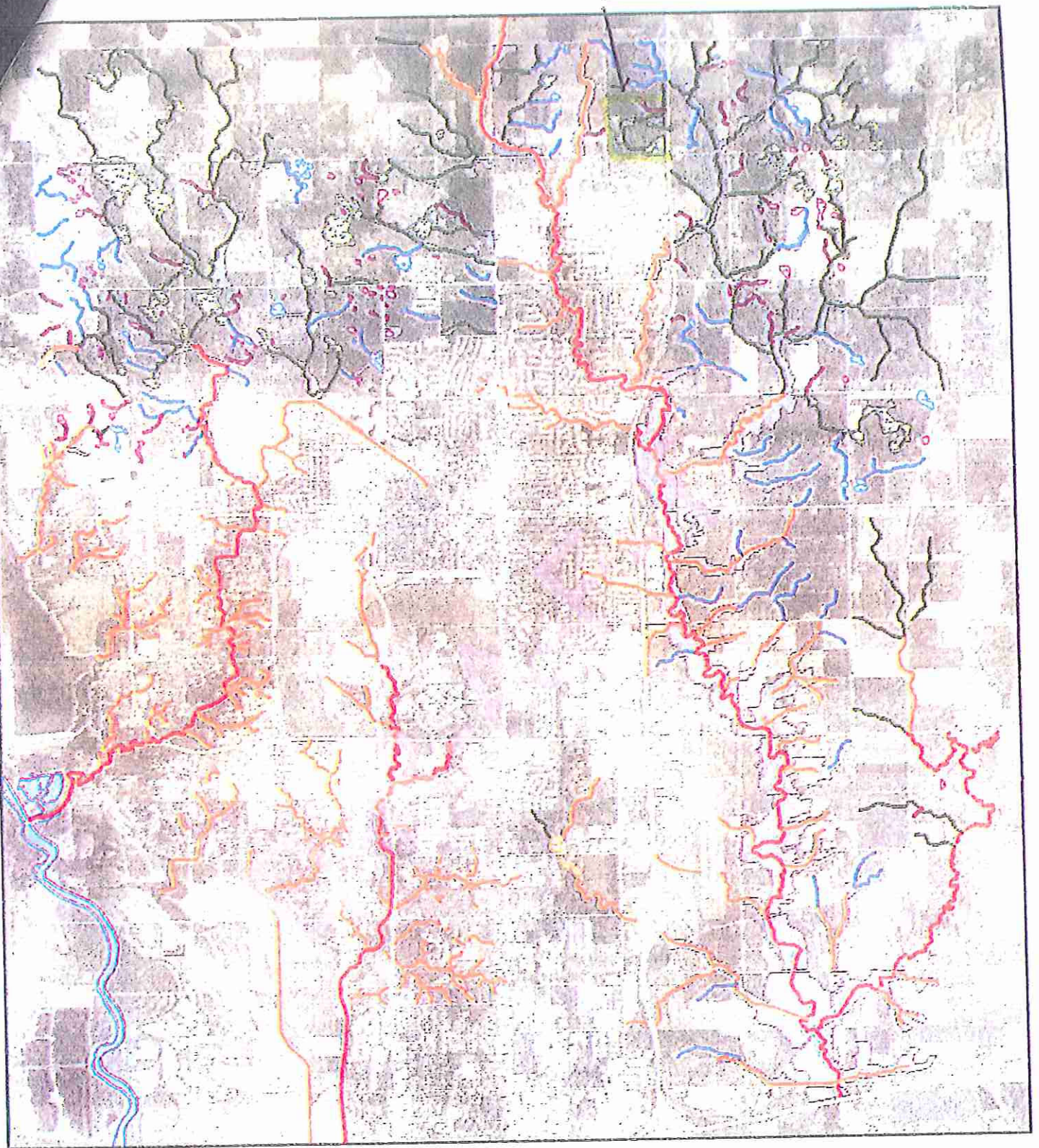
**Major Unchannelized Streams (Category C):** Lesser defined stream corridors in developing areas with significant watersheds

These streams do not usually have established flood plains and are less eroded or dewatered, often lacking defined streambanks. These areas either have established baseflows at the surface or via tile networks thorough agricultural areas. These corridors often have watersheds of 60 – 2000 acres (but can be up to several square miles in size in some cases). As development occurs around these corridors, the concern is that they may become more defined, eroded and channelized – leading to faster flow velocities and higher peak flow rates.















our farm



### Legend

Stream		C	Potholes		D		Stream Corridor
	A		D		B		E
	B		E		C		



0 3,000 6,000 12,000 Feet

## Stream Classifications



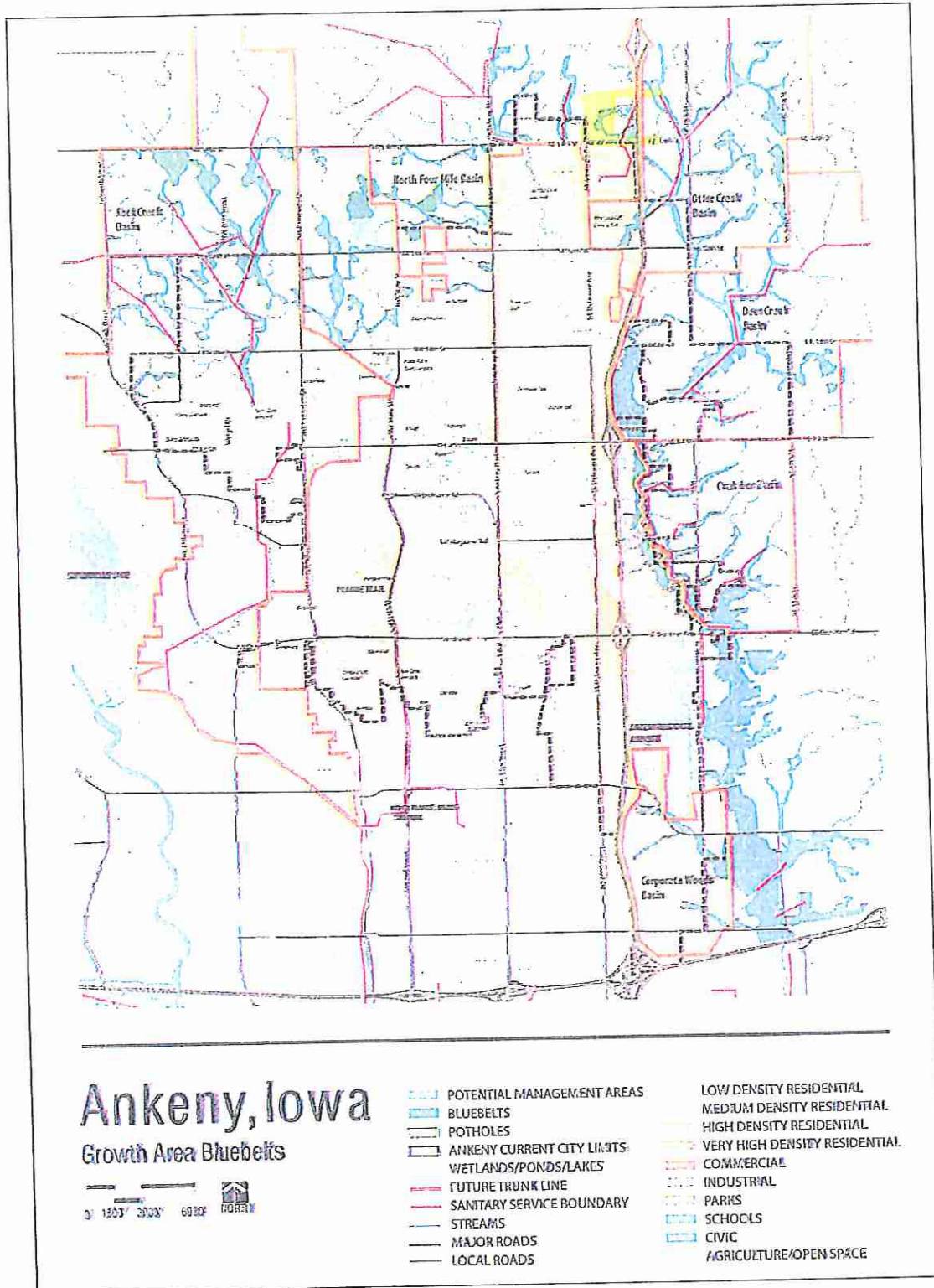


Figure 5.1: Growth Area Bluebelts



		shade trees in parking lots, landscaping on planter strips between the parking lot and street, and well-designed, monument-type signage.
Commercial Corridor Mixed Use	<ul style="list-style-type: none"> <li>• Include auto-oriented, primarily retail/service/office commercial and high density residential areas that serve surrounding neighborhoods as well as citywide consumers.</li> <li>• Typically contains small scale retail and personal services as well as community uses such as major grocery stores and office buildings.</li> </ul>	<ul style="list-style-type: none"> <li>• Typically located along major transportation corridors, lining both sides of the street.</li> <li>• Pedestrian traffic should be encouraged and neighborhood scale retained where applicable.</li> <li>• Signage and site features should respect neighborhood scale.</li> <li>• Commercial and office development in mixed-use areas should minimize impact on housing.</li> </ul>
Office/Business Park	<ul style="list-style-type: none"> <li>• Business parks may combine office and light industrial/research uses.</li> <li>• Provides for users that do not generate noticeable external effects.</li> </ul>	<ul style="list-style-type: none"> <li>• Strict control over signage, landscaping, and design is necessary for locations nearer to low intensity uses.</li> </ul>
Industrial	<ul style="list-style-type: none"> <li>• Industrial provides for a range of industrial enterprises, including those with significant external effects.</li> </ul>	<ul style="list-style-type: none"> <li>• General industrial sites should be well-buffered from less intensive use.</li> <li>• Sites should have direct access to major regional transportation facilities, without passing through residential or commercial areas.</li> <li>• Developments with major external effects should be subject to Planned Development review.</li> </ul>
Parks	<ul style="list-style-type: none"> <li>• Includes parks, recreation, designated greenways and community open spaces.</li> </ul>	<ul style="list-style-type: none"> <li>• Neighborhood parks (5 to 10 acres) are generally located in the center of each neighborhood (1 per section of land).</li> <li>• Community parks (10-50 acres) should be distributed around the City with a 1 to 2 mile service radius.</li> <li>• Parks should be served by the comprehensive trail and greenway system.</li> </ul>
Schools	Includes schools	<ul style="list-style-type: none"> <li>• These areas are generally located in the center of the neighborhood and should function as an open space area for the neighborhood.</li> <li>• They may include an elementary or middle school and/or neighborhood park, depending on the specific needs of the neighborhood.</li> </ul>
Civic	<ul style="list-style-type: none"> <li>• Includes churches, libraries, and other public facilities that act as centers of community activity.</li> </ul>	<ul style="list-style-type: none"> <li>• May be permitted in a number of different areas, including residential areas.</li> <li>• Individual review of proposals requires an assessment of operating characteristics, project design, and traffic management.</li> </ul>
Bluebelts/Greenways	<ul style="list-style-type: none"> <li>• Includes environmentally sensitive areas, including high slopes, creek basins, floodplains, wetlands, wooded areas that will remain generally undeveloped.</li> </ul>	<ul style="list-style-type: none"> <li>• These areas should remain undeveloped or in passive recreation use.</li> <li>• Greenways should follow environmental features or be pre-designated through development areas.</li> <li>• Good pedestrians and bicycle links should be provided, including non-motorized access to surrounding residential areas.</li> </ul>
Public Facilities and Utilities	<ul style="list-style-type: none"> <li>• Includes facilities with industrial operating characteristics, including public utilities, maintenance facilities, and public works yards.</li> </ul>	<ul style="list-style-type: none"> <li>• Industrial operating characteristics should be controlled according to same standards as industrial uses.</li> <li>• When possible, should generally be located in industrial areas.</li> </ul>

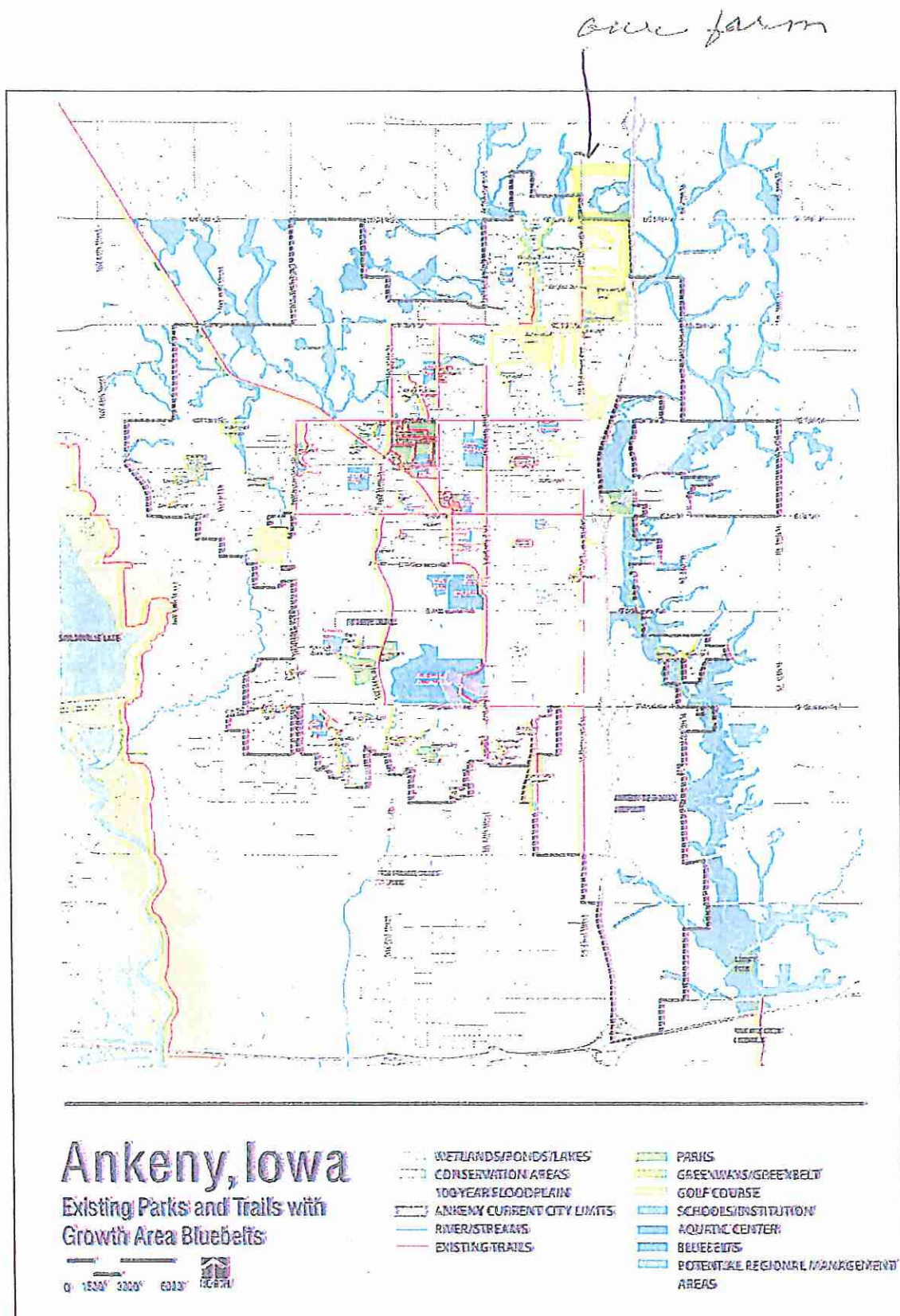
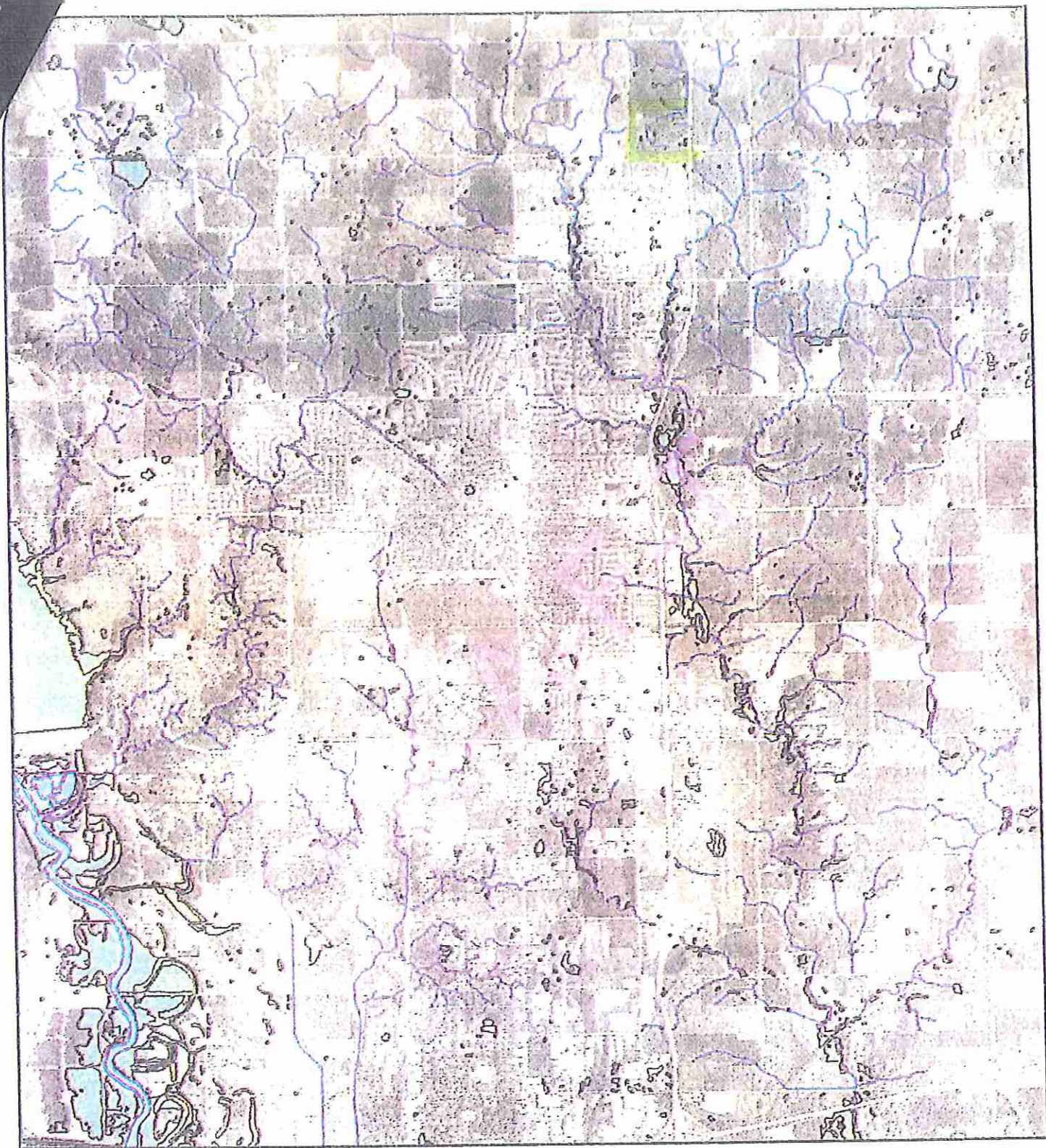



Figure 6.4: Existing Parks and Trails with Growth Area Bluebelts





Legend

 National Wetland Inventory

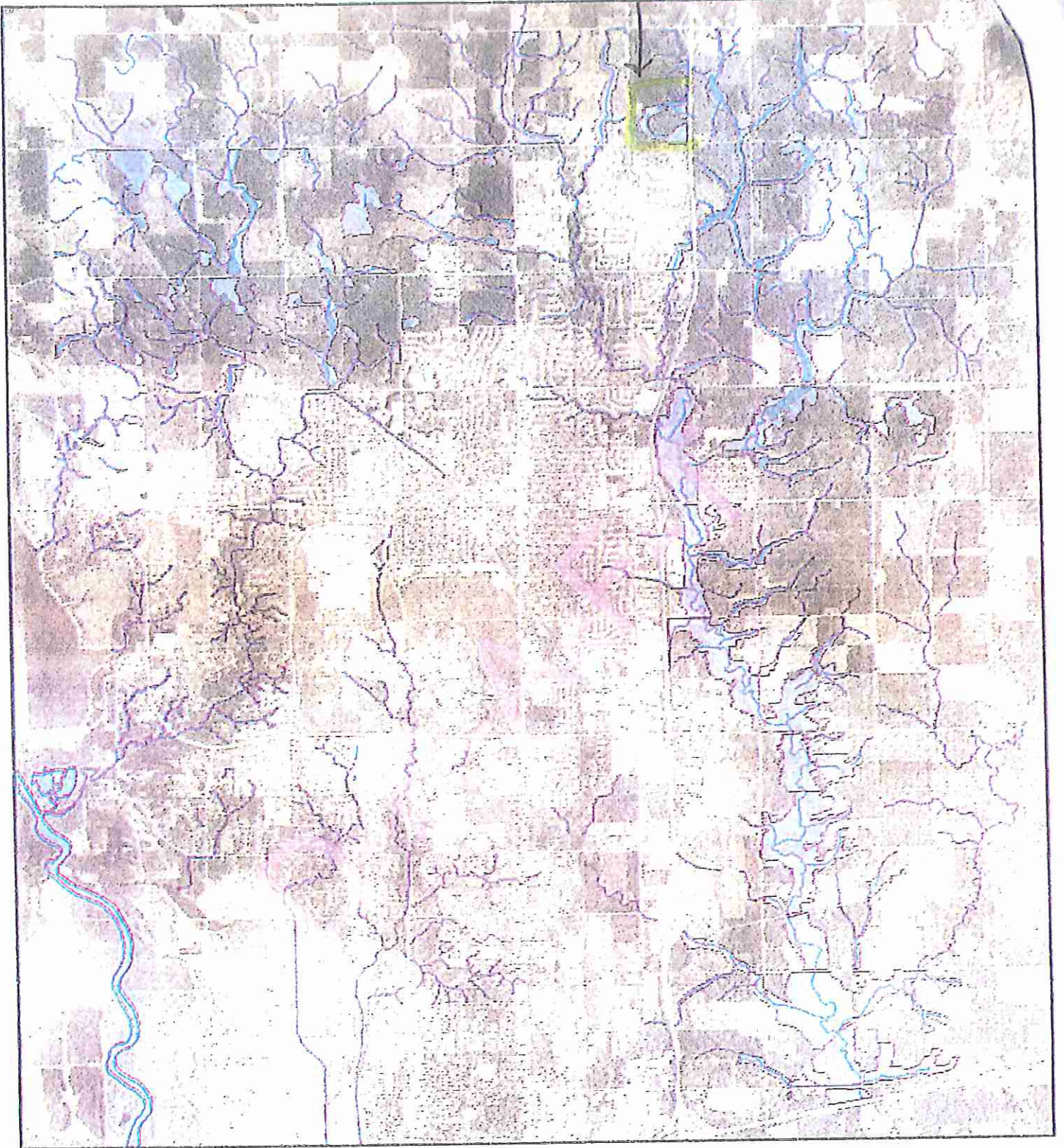


0 3,000 6,000 12,000  
Feet

Identified Wetlands



over forest



Legend

Stream Corridor Potential Management Areas

Blue Belt







## IMPLEMENTATION RECOMMENDATIONS

Many of the methods of dealing with rainwater and environmental issues discussed in this chapter represent significant changes from past policies and design guidelines. To fully implement these concepts, the following action items are recommended.

- **Implement use of the Iowa Stormwater Management Manual as requirements for design calculations.** This manual addresses the design of management practices to manage both small and large rainfall events.
- **Review existing ordinances for items that conflict with concepts discussed in this chapter.** Policies that govern site development, parking requirements, weed control and other items can often run contrary to better site design and rainwater management practices.
- **As financially viable, correct identified major storm water related issues.** Use grants, loans and storm water utility fees to address these issues before they worsen.
- **Create new ordinances as necessary.** To codify the guidelines within this chapter it may be necessary to create ordinances that govern stream buffers and sensitive areas.
- **In developing areas, reserve the anticipated 500-year flood plain as open space along significant stream corridors.** This area can be developed into the City's Bluebelt network, giving rainwater its own dedicated space where it can be managed effectively and reduce the potential to negative impacts to public and private property. Along streams with watersheds of under 300 acres (some category B and D), the area between the 100- and 500-year flood limits may be reserved within private easement rather than within the separate parcel that delineates the bluebelt corridor.
- **Manage the growth of trees and brush along major stream corridors.** High quality trees are assets, but uncontrolled growth of trees and brush can limit sunlight to the surface, causing more erosion resistant ground cover to be lost. A program of seasonal mowing or burning can limit the growth of undesired species in these areas. Selective clearing may be necessary in certain areas where trees and brush have been allowed to become too dense.
- **Develop a routine maintenance program for City rainwater management facilities.** If constructed best management practices (BMPs) to control water quality and quantity are effective, they will capture sediments and other pollutants that will need to be removed at certain intervals. Each developed practice should have a typical maintenance schedule where they are inspected for proper performance and captured sediments and other items are removed and disposed of safely.
- **Study individual Bluebelt corridors to develop a more detailed concept plan for each.** When development is set to expand into a new part of a Bluebelt watershed, that corridor should be studied in more detail to better define the size and location of management facilities, the types of practices to be constructed and the amount of land that will need to be reserved to follow the performance guidelines for the corridor as outlined in this chapter.